

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re: Alecia Vickers) Case Number: 20-13108
Debtor.) Chapter 13 Proceedings
) Judge Jessica E. Price Smith

TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO MODIFY PLAN

Now comes **LAUREN A. HELBLING**, the duly appointed and qualified Standing Chapter 13 Trustee ("Trustee") herein, by and through counsel, and hereby objects to the Debtor's Motion to Modify Plan filed with this Court on October 1, 2020 (hereinafter "Debtor's Motion"). In support of her objection, the Trustee makes the following representations to the Court:

1. The Trustee's Objection to Confirmation filed August 27, 2020, is still outstanding, specifically the Prosecution, Omitted Claims, and Liquidation paragraphs.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to deny the Debtor's Motion for the reasons cited.

Respectfully submitted,

/s/ Holly Davala
HOLLY DAVALA #0070447
Staff Attorney for Chapter 13 Trustee
Office of the Chapter 13 Trustee, Lauren A. Helbling
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CERTIFICATE OF SERVICE

I certify that on October 6, 2020, a true and correct copy of Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Renee Heller, Attorney, on behalf of Debtor at rhlegal@aol.com

/s/ Holly Davala

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